

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# NOVELIS DO BRASIL LTDA.

CERTIFICATE  
NUMBER

239

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE

25 NOVEMBER 2022

DATE OF EXPIRY

24 NOVEMBER 2025

CERTIFIED SINCE

25 NOVEMBER 2022

AUTHORISED BY

A handwritten signature in white ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at*

[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)

CERTIFICATION SCOPE

Novelis Office - São Paulo, Brazil;  
Novelis Brazil - Pindamonhangaba Facility  
(Production and Transformation, Aluminum Re-  
melting/Refining, Casthouses, Other manufacturing  
or sale of products containing Aluminum);  
Cariacica Distribution Center and the Collection  
Centers at: Ananindeua, Bauru, Brasília,  
Campinas, Curitiba, Juiz de Fora, Parnamirim,  
Pindamonhangaba, Recife, João pessoa, São  
Paulo, Sertãozinho, Salvador, São Gonçalo (Other  
manufacturing or sale of products containing  
Aluminium).

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY STANDARD

### OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis do Brasil LTDA.
CERTIFICATION SCOPE	Novelis Office - São Paulo, Brazil; Novelis Brazil - Pindamonhangaba Facility (Production and Transformation, Aluminum Re-melting/Refining, Casthouses, Other manufacturing or sale of products containing Aluminum); Cariacica Distribution Center and the Collection Centers at: Ananindeua, Bauru, Brasília, Campinas, Curitiba, Juiz de Fora, Parnamirim, Pindamonhangaba, Recife, João pessoa, São Paulo, Sertãozinho, Salvador, São Gonçalo (Other manufacturing or sale of products containing Aluminium).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li><li>• Post-Casthouse</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Chain of Custody Standard V1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit (17 August – 28 October 2022)</li></ul>
AUDIT FIRM	<ul style="list-style-type: none"><li>• DNV Business Assurance Services UK Ltd.</li></ul>
AUDIT DATE	<ul style="list-style-type: none"><li>• 17 August – 28 October 2022 (Initial Certification Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 9 November 2022 (Initial Certification Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (17 August – 28 October 2022)</u></p> <p>The audit scope covers all activities on the Pindamonhangaba site (Brazil) for the production of flat rolled aluminium and Recycling Collection Centres throughout Brazil at: Ananindeua, Bauru, Brasília, Campinas, Curitiba, Juiz De Fora, Parnamirim, Pindamonhangaba, Recife, Salvador, Sertãozinho, São Paulo, João Pessoa, São Gonçalo, Cariacica Distribution Centre and other manufacturings or sale of products containing Aluminium.</p> <p>The ASI multi-site sampling approach was undertaken to include the Collection Centres Brasília, Campinas, Parnamirim, Pindamonhangaba São Paulo, and João Pessoa.</p>

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Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Post-Casthouse

All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.

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AUDIT  
OUTCOME

- Certification

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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

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CERTIFICATION  
PERIOD

25 November 2022 – 24 November 2025

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

24 May 2024

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CERTIFICATION  
NUMBER

239

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is a member of ASI since 2015 in the Production & Transformation Class for Standard Performance and the Post-Casthouse for Chain of Custody Standard. <a href="https://aluminium-stewardship.org/about-asi/asi-members/novelis-inc">https://aluminium-stewardship.org/about-asi/asi-members/novelis-inc</a>
1.2 Management system	Conformance	The Entity has established a Management System for all Facilities under the Entity's control that have CoC Material Custody. The Entity has developed the operational procedures for managing the Chain of Custody.
1.3 Management system reviews	Conformance	The Entity has developed the operational procedures for managing the Supply Chain Escrow, which is periodically updated to address areas that may generate potential risks of non-compliance.
1.4 Management representative	Conformance	The Entity has appointed the Manager of Quality and Certification as the Management Representative who holds responsibility and authority for compliance with all requirements of the ASI Chain of Custody Standard. The Representative has full support from the ASI Committee, to ensure an integrated view of the organisation, compliance with the criteria and implementation of processes.
1.5 Training	Conformance	The Entity has implemented communication and training measures for all involved with the CoC Certification and promoted the awareness of CoC Certification to employees.
1.6 Record keeping	Conformance	The Entity has defined in the 'Manual do Sistema Integrado – ASI' ('Integrated System Manual – ASI') that all documents related to the ASI Chain of Custody Standard must be retained for a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity has defined within its 'Integrated System Manual – ASI' to provide the Input and Output quantities of Material/s CoC throughout the calendar year and report the information within a maximum period of six months after each calendar year to the ASI Secretariat.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity has defined within its 'Integrated System Manual – ASI', to provide the Input Percentage/s calculated for the calendar year

CRITERION	RATING	COMMENT
		and report the information within a maximum period of six months after each calendar year to the ASI Secretariat.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity has defined within its 'Integrated System Manual – ASI', to determine the maximum positive balance in the calendar year carried over to the subsequent material accounting period (if applicable), and to report the information no later than six months after each calendar year to the ASI Secretariat.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity defined within its 'Integrated System Manual – ASI', to determine the maximum Internal Overdraw within the calendar year (if applicable), and the CoC Material Input Quantity percentage that this represents and report the information no later than six months after each calendar year to the ASI Secretariat.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity defined within its 'Integrated System Manual – ASI', the total amount of Eligible Scrap Input, with a breakdown by Post-Consumer Scrap and Pre-Consumption Scrap that is designated as CoC Material supplied directly from a CoC Certified Entity and reports the information within 6 months after each calendar year to the ASI Secretariat.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion is not applicable, as the Entity does not use ASI Credits.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	This Criterion is not applicable, as the Entity does not use ASI Credits
<b>2 OUTSOURCING CONTRACTORS</b>		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.
2.2a Control of CoC Material	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.
2.2b No further outsourcing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.
2.2c Risk assessment	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.

CRITERION	RATING	COMMENT
2.3 Output Quantity	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.
2.4 Verification and record-keeping	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.
2.5 Error management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope as the Entity does not use Outsourcing Contractors.

### 3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL

3.1a CoC Certification Scope – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Performance Standard – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a CoC Certification Scope – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Performance Standard – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a CoC Certification Scope – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Performance Standard – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

### 4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL

4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Conformance	The Entity has defined procedures and systems to ensure that ASI Liquid Metal is sourced from ASI Entities Certified to ASI Performance Standard or within the Entity's CoC Certification Scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	The Entity has defined procedures and systems to ensure that ASI Liquid Metal is sourced from ASI Entities Certified to ASI Performance Standard or within the Entity's CoC Certification Scope.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity has defined procedures and systems to ensure that Pre-Consumer Scrap and Slag are sourced from ASI Entities Certified to ASI Performance Standard or within the Entity's CoC Certification Scope.
4.2b Post-Consumer Scrap	Conformance	The Entity has defined procedures and systems to ensure that the Scrap that is eligible in its accounting system is considered only as Post-Consumer and subject to supplier Due Diligence, or

CRITERION	RATING	COMMENT
		that the Post-Consumer Scrap comes from ASI Entities Certified to ASI Performance Standard or within the Entity's CoC Certification Scope.
4.3a Supplier records	Conformance	The Entity has defined the method to ensure that all direct Suppliers of Scrap Recycling have a respective record including identity, place of operation and applicable legal documents and consent to meet the requirements of the Supplier Code of Conduct.
4.3b Cash payments	Conformance	The Entity does not make cash payments for any type of supply.

#### 5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

5.1a CoC Certification Scope – Casthouses	Conformance	The Entity has implemented an ASI Integrated Manual and an established Mass Balance system to ensure that Primary ASI Aluminium and Recycled ASI Aluminium are produced only from foundries that are within the Entity's CoC Certification Scope and/or in which the Entity holds a legal interest and is within the CoC Certification Scope of another CoC Certified Entity. The Entity has demonstrated that post-consumer Recycled Aluminium Materials can be purchased through the Entity's Collection Centres, which are ASI Performance Standard Certified.
5.1b ASI Performance Standard – Casthouses	Conformance	The Entity has defined procedures and systems to ensure that Primary Aluminium comes from ASI Entities Certified to the ASI Performance Standard. The Entity demonstrates that Recycled Aluminium Materials can be purchased through the Entity's Collection Centres, which are ASI Performance Standard Certified.
5.2 Casthouse Products	Conformance	The Entity has defined its Mass Balance process for the identification of Materials and to ensure identification numbers are printed on an ASI Aluminium can be linked to the Input Quantity of CoC Material for the Material Accounting Period.

#### 6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

6.1a CoC Certification Scope - Post-Casthouse	Conformance	The Entity's plants in operation are included within the Entity's CoC Certification Scope and can receive Certified and Post-consumer materials. Only the Pindamonhangaba site can produce ASI Certified Products.
6.1b ASI Performance Standard - Post-Casthouse	Conformance	The Entity has defined in the ASI Integrated Manual that ASI Aluminium is produced only by the Entity and/or in an ASI Performance Standard Certified

CRITERION	RATING	COMMENT
		Entity or that the manufacturing Entity is in the process of certification in accordance with the ASI Performance Standard.
6.1c Sourcing ASI Aluminium	Conformance	The Entity has established systems to ensure that it produces ASI Aluminium only from an Entity/Facility that supplies ASI Aluminium directly from another ASI Chain of Custody Certified Entity, Collection Centres, through a metal dealer or warehouse where the ASI Certified Entity can provide or verify the associated CoC Document containing the required information.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has defined a process as part of the supplier approval process to address Anti-Corruption by asking suppliers to submit and accept the Supplier Code of Conduct. The Entity has also implemented an Ethical and Responsible Purchasing Policy. <a href="https://pt-br.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-PRB-A4-04292021.pdf">https://pt-br.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-PRB-A4-04292021.pdf</a>
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has defined Responsible Sourcing and Anti-Corruption process, requesting suppliers to submit and accept the Supplier Code of Conduct. <a href="https://pt-br.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-PRB-A4-04292021.pdf">https://pt-br.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-PRB-A4-04292021.pdf</a>
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has defined a Responsible Sourcing and an Anti-Corruption process, requesting suppliers to submit and accept the Supplier Code of Conduct, which includes Human Rights. <a href="https://pt-br.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-PRB-A4-04292021.pdf">https://pt-br.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-PRB-A4-04292021.pdf</a>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has defined a Responsible Sourcing and Anti-Corruption process, requesting suppliers to submit and accept the Supplier Code of Conduct, which includes Human Rights. The Entity has established an Integrity Program Executive Committee that assesses procurement risks in Conflict-Affected and High-Risk Areas (CAHRAs). <a href="https://pt-br.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-PRB-A4-04292021.pdf">https://pt-br.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-PRB-A4-04292021.pdf</a> <a href="https://pt-br.novelis.com/about-us/integridade">https://pt-br.novelis.com/about-us/integridade</a>



CRITERION	RATING	COMMENT
7.2 Risk assessment	Conformance	The Entity has assessed the risks of non-compliance with its Responsible Purchasing Policy by suppliers of Non-CoC Materials and Recyclable Scrap, through the Supplier Code of Conduct, Integrity Program, and the supplier's Legal Documentation (Mandatory) assessment.
7.3 Complaints mechanism	Conformance	The Entity has established a grievance mechanism appropriate to the nature, scale, and impact of the business and which allows all Stakeholders and rightsholders to express concerns about non-compliance with its Responsible Sourcing Policy in its aluminium supply chain. The 'Vox Novelis' is a communication channel for Novelis South America customers and suppliers, the channel is confidential and operated by an independent company to ensure communication security. Email: <a href="mailto:voxnovelis@linhaetica.com.br">voxnovelis@linhaetica.com.br</a> Phone: 0800-200-7170 Website: <a href="http://www.linhaetica.com.br/etica/voxnovelis">www.linhaetica.com.br/etica/voxnovelis</a>
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established a Mass Balance System for Certified materials to control ASI Certified material Inputs and Outputs and determine the Input and Output volumes in the system.
8.2a Post-Consumer Scrap	Conformance	The Entity has established a Mass Balance System for Certified materials to control ASI Certified material Inputs and Outputs including the amount of Post-Consumer Scrap Input.
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity has established a Mass Balance System for Certified materials to control ASI Certified material Inputs and Outputs including the Input Quantity of Pre-Consumer Scrap and Internal Scrap.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The Entity has established a Mass Balance System for Certified materials to control ASI Certified material Inputs and Outputs including Pre-consumer Scrap Input Quantity supplied directly from a CoC Certified Entity.
8.3 Material Accounting Period	Conformance	The Entity defined the Accounting system as a period of 12 months within a calendar year.
8.4 Input Percentage	Conformance	The Entity has established a Mass Balance System to manage and track the ASI certified Aluminium from processing to the customers, which includes the Input Percentage for a given Material Accounting Period.

CRITERION	RATING	COMMENT
8.5 Input Percentage (Aluminium Re-Melting/Refining)	Conformance	The Entity has established a Mass Balance System to manage and track the ASI Certified Aluminium from process to the customers, which includes the Input Percentage for a given Accounting Period.
8.6 Output Quantity determination	Conformance	The Entity has established a Mass Balance System to manage and track the ASI Certified Aluminium through processing to the customers, which includes calculating and recording the Output Quantity.
8.7 Output Quantity designation	Conformance	The Entity has established a Mass Balance System to manage and track the ASI Certified Aluminium through processing to the customers, which includes the Output Quantity of CoC Material. This may be a subset of the total production and designated as 100% CoC Material.
8.8 Output Quantity - Pre-Consumer Scrap	Conformance	The Entity has established a Mass Balance System to manage and track the ASI Certified Aluminium through the processing to the customers. The Entity produces Pre-Consumer Scrap from its processes and uses the Incoming Percentage for the 12-month Material Accounting Period to determine the Outgoing Eligible Scrap Amount.
8.9 Outputs not exceed Inputs	Conformance	The Entity has established a Mass Balance System to manage and track the ASI Certified Aluminium through processing to the customers, and not exceed the Incoming Percentage applied to the total Input of CoC Material and Eligible Scrap during the Material Accounting Period of 12 months.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity has established the Mass Balance System to ensure the Internal Withdrawal does not exceed 20% of the total CoC Material Input Quantity for Material Accounting within 12 months.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity has implemented an ASI Integrated Manual to manage situations where there is a delay of ASI Aluminium material due to force majeure. The Entity's Material Accounting System is prepared to transfer an Internal Withdrawal to the subsequent Material Accounting Period.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity has implemented an ASI Integrated Manual to determine the Criterion that the Internal Overdraw must not exceed 20% of the total amount of CoC Material Input for the Material Accounting Period.

CRITERION	RATING	COMMENT
8.11a Positive Balance (carry over)	Conformance	The Entity has defined within its Accounting system for CoC to ensure that the transfer of a Positive Balance can be carried forward to the subsequent accounting period.
8.11b Positive Balance (expiry)	Conformance	The Entity has implemented an ASI Integrated Manual and Accounting system to ensure that the transfer of a Positive Balance can be carried forward to the subsequent accounting period and will expire at the end of that period if not withdrawn.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has developed a CoC Document that is sent with all shipments of Certified products, since the materials are accompanied by invoices/delivery notes which contain information about the shipment, such as issuing company, recipient, type of product, net weight shipping, date, and reference number.
9.2a Date of issue	Conformance	The Entity has developed a CoC Document that is sent in all shipments of Certified products and contains information about the shipment and the date of issue of the CoC Document.
9.2b Reference number	Conformance	The Entity has developed a CoC Document that is sent in all shipments of Certified products and contains the reference number of the CoC Document linked to the Material Accounting System of the Entity for verification purposes.
9.2c Issuing Entity	Conformance	The Entity has developed a CoC Document that is sent with all shipments of Certified products and contains information about the shipment and the Entity that issued the CoC Document.
9.2d Receiving customer	Conformance	The Entity has developed a CoC Document that is sent with all Certified products and contains information about the shipment, and the address of the customer who will receive the CoC Document.
9.2e Responsible employee	Conformance	The Entity has developed a CoC Document that is sent with all Certified products and contains the data of the responsible employee of the Entity who can verify the CoC Document information at the final destination.
9.2f Conformance statement	Conformance	The Entity has developed a CoC Document that is sent with all shipments of Certified products which contains the information: 'The information provided

CRITERION	RATING	COMMENT
		in the CoC Document complies with ASI Certified Metal’.
9.2g Type of CoC Material	Conformance	The Entity has developed a CoC Document that is sent in all shipments of CoC Certified products with the CoC Certification number and type of CoC Material in the shipment.
9.2h Mass of CoC Material	Conformance	The Entity has developed a CoC Document that is sent in all shipments of CoC Certified products, which includes the type of Coc Material Mass and Liquid Mass weight, which will be sent to another CoC Certified Entity.
9.2i Mass of total material	Conformance	The Entity has developed a CoC Document that is sent in all shipments of CoC Certified products which contains information about the shipment, such as company issuing, recipient, product type, net shipment weight, date, reference number and Mass of the total material in shipment.
9.3a Sustainability Data (optional)	Conformance	The Entity has determined it will not be providing Sustainability Data in the CoC Document and will only make it available when requested and agreed with the receiving Entity.
9.3b Sustainability Data (passing on)	Conformance	The Entity has determined it will not be providing Sustainability Data in the CoC Document and will only make it available when requested and agreed with the receiving Entity.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has determined it will not be providing Sustainability Data in the CoC Document and will only make it available when requested and agreed with the receiving Entity.
9.4 Supplementary Information (optional)	Conformance	The Entity has determined it will not be providing Sustainability Data in the CoC Document and will only make it available when requested and agreed with the receiving Entity.
9.5 Response to verification requests	Conformance	The Entity has defined within the ‘Integrated System Manual – ASI’ that the system to manage requests and information requested by the Entities receiving the Material is via the CoC Documents and invoices issued by the issuing Entity.
9.6 Error management	Conformance	The Entity has defined within the ‘Integrated System Manual – ASI’, that the process to correct possible non-conformities after sending the CoC Material or eligible scrap, as defined in the Non-Conformity Treatment Procedure.

CRITERION	RATING	COMMENT
<b>10 RECEIVING COC DOCUMENTS</b>		
10.1 Verify required information included	Conformance	The Entity has defined a process and has trained employees responsible for verifying the required information.
10.2 Verify consistency with shipments	Conformance	The Entity has defined within the 'ASI Integrated Manual', a system for receiving Primary ASI CoC materials and/or Eligible Scrap that accompanies it before recording the information in the Material Accounting system. The Entity has demonstrated with several simulated tests were conducted to receive Certified material at the units that are in the scope of certification.
10.3 Verify supplier CoC Certification status	Conformance	The Entity checks the ASI website regularly to verify the validity and scope of the supplier's ASI CoC Certification for any changes that might affect the status of the supplied CoC Material or Eligible Scrap.
10.4 Error management	Conformance	The Entity has defined in the 'Integrated System Manual – ASI', the method for correcting possible non-conformities after receipt of the CoC Material or Eligible Scrap, documenting following the qualification, monitoring Suppliers and the registration of non-conformities.
<b>11 MARKET CREDITS SYSTEM: ASI CREDITS</b>		
11.1a Material Accounting System – allocation	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1c No double counting	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2a Date of issue	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2b Reference number	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.

CRITERION	RATING	COMMENT
11.2e Conformance statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2g Quantity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3c Expiry	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3d No re-trading	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
<b>12 CLAIMS AND COMMUNICATIONS</b>		
12.1a ASI Claims Guide	Conformance	The Entity has defined the methodology to ensure that all future claims on CoC Material outside the CoC Documents are made in a manner consistent with the ASI Claims Guide.
12.1b Verifiable evidence	Conformance	The Entity has established procedures to ensure that it keeps verifiable evidence to support the claims and/or representations made.
12.1c Employee training	Conformance	The Entity has defined that appropriate training will be provided for relevant employees to properly understand and communicate claims and/or representations.

#### **Document Control and Version History**

Revision	Date	Notes
0	25 November 2021	Initial Certification Audit – Full Certification